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April 11, 2022

BY ECF

The Honorable Edgardo Ramos
United States District Court Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Stanislav Yakubov
Docket No.: 22-CR-00206-ER-1

Your Honor:

Greetings.

Under the current conditions of release Mr. Yakubov's travel is restricted to SDNY and EDNY, with travel to any other jurisdiction requiring approval.

The Defense respectfully request that the Honorable Court permit Mr. Yakubov reasonable travel to Miami, Florida, for a pre-scheduled Passover family holiday with his wife and children, from April 18th, 2022, to April 25th, 2022.

Pre-Trial Services Officer Karina Vilefort has no objection to said travel request and has indicated that to date, Mr. Yakubov has been fully compliant with the terms of his release.

AUSA Matthew Andrews' position is to defer to U.S. Pre-Trial Services.

Thank you for your consideration.

Respectfully submitted,

Oliver S. Storch, Esq.

SO ORDERED:

United States District Court Judge

OS/gp
cc: AUSA Matthew Andrews